



May 30, 2024

VIA E-FILING

The Honorable Gregory B. Williams
J. Caleb Boggs Federal Building
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801-3555

Re: Nokia Corporation, et al. v. Amazon.com, Inc., et al., C.A. No. 23-cv-1236-GBW

Dear Judge Williams:

Per the Court's Oral Order (D.I. 26), Plaintiffs identify the following cases as most similar to the patents at issue:

For 6,950,469; 7,280,599; and 8,036,273, Nokia identifies *Cal. Inst. of Tech. v. Broadcom Ltd.*, 25 F.4th 976, 988 (Fed. Cir. 2022) (U.S. Patent No. 7,916,781, Claim 13). Like in *Cal. Inst. of Tech.*, these patents do not claim "mathematical formula[s] as such." *Id.* Rather, the claims provide improved methods of interpolation in video coding.

For 7,724,818 (cl. 1), Nokia identifies *Packet Intelligence LLC v. NetScout Sys.*, 965 F.3d 1299, 1309-10 (Fed. Cir. 2020). Even more concrete than the "granular, nuanced, and useful classification of network traffic" in *Packet Intelligence*, the '818 Patent claims a granular, nuanced, and useful data structure: a hierarchical parameter set structure requiring sequence and picture parameter sets with at least one picture parameter value in the slice header. *See also Enfish LLC v. Microsoft Corp.*, 822 F.3d 1327, 1339 (Fed. Cir. 2016) ("a specific type of data structure designed to improve the way a computer stores and retrieves data in memory" was not directed to an abstract idea).

For 6,968,005 and 8,144,764, Nokia identifies *Koninklijke KPN N.V. v. Gemalto M2M GmbH*, 942 F.3d 1143 (Fed. Cir. 2019). Like *KPN*, these patents provide an improvement upon conventional technology by including additional "check data" for error detection—here, an indicator to differentiate between missing reference and non-reference pictures. *Id.* at 1150. *See also Enfish LLC v. Microsoft Corp.*, 822 F.3d 1327 (Fed. Cir. 2016) ("a specific type of data structure designed to improve the way a computer stores and retrieves data in memory" was not directed to an abstract idea).

Respectfully submitted,

/s/ Brian E. Farnan

Brian E. Farnan

cc: Counsel of Record (Via E-Filing)